

# Exhibit 2

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**From:** Burden, Ashley <ABurden@CFTC.gov>  
**Sent:** Friday, September 22, 2023 4:09 PM  
**To:** Dakota Speas; Paulson, Katherine; Streit, Elizabeth M.  
**Cc:** Robert Zink; Michael Shaheen; Matthew Feibert; Isabelle Sun  
**Subject:** RE: [EXTERNAL] CFTC v. Traders Global Group, Inc., et al.

[EXTERNAL EMAIL from [aburden@cftc.gov](mailto:aburden@cftc.gov)]

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Thanks, Dakota. Very good.

Can you advise please for planning purposes whether Mr. Kazmi will be taking 5 in the depositions? If Kazmi is taking 5, I have to believe that we get through this in a day. If not, then the CFTC may have to insist on its right to take seven hours for each dep, per FRCP 30(d)(1), and thus continue into subsequent days.

Also, if Mr. Kazmi takes 5 in his capacity as 30(b)(6) rep, the CFTC reserves its right to complain that corporations have no 5<sup>th</sup> A rights and insist that TGG provide a designated 30(b)(6) rep to answer questions at a later juncture.

Thanks,

A

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**From:** Dakota Speas <dakotaspeas@quinnemanuel.com>  
**Sent:** Friday, September 22, 2023 2:34 PM  
**To:** Burden, Ashley <ABurden@CFTC.gov>; Paulson, Katherine <KPaulson@CFTC.gov>; Streit, Elizabeth M. <estreit@CFTC.GOV>  
**Cc:** Robert Zink <robertzink@quinnemanuel.com>; Michael Shaheen <michaelshaheen@quinnemanuel.com>; Matthew Feibert <matthewfeibert@quinnemanuel.com>; Isabelle Sun <isabellesun@quinnemanuel.com>  
**Subject:** RE: [EXTERNAL] CFTC v. Traders Global Group, Inc., et al.

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Ashley: let's plan for the deposition to take place on October 2, remotely. We can triple dip with Mr. Kazmi testifying in his personal capacity and also as a 30(b)(6) witness for TGG US and TGG CAN. Defendants reserve all rights.

--Dakota

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**From:** Burden, Ashley <ABurden@CFTC.gov>  
**Sent:** Monday, September 18, 2023 8:43 AM  
**To:** Dakota Speas <[dakotaspeas@quinnemanuel.com](mailto:dakotaspeas@quinnemanuel.com)>; Paulson, Katherine <[KPaulson@CFTC.gov](mailto:KPaulson@CFTC.gov)>; Streit, Elizabeth M. <[estreit@CFTC.GOV](mailto:estreit@CFTC.GOV)>  
**Cc:** Robert Zink <[robertzink@quinnemanuel.com](mailto:robertzink@quinnemanuel.com)>; Michael Shaheen <[michaelshaheen@quinnemanuel.com](mailto:michaelshaheen@quinnemanuel.com)>; Matthew

Feibert <[matthewfeibert@quinnemanuel.com](mailto:matthewfeibert@quinnemanuel.com)>; Isabelle Sun <[isabellesun@quinnemanuel.com](mailto:isabellesun@quinnemanuel.com)>

**Subject:** RE: [EXTERNAL] CFTC v. Traders Global Group, Inc., et al.

[EXTERNAL EMAIL from [aburden@cftc.gov](mailto:aburden@cftc.gov)]

Counsel:

With respect to your proposals below:

- We are in receipt of Ds' discovery requests. I am not in a position to discuss a production timetable today, but I will revert when I have more details.
- The CFTC agrees that each party should provide the other with docs received from any third party pursuant to a subpoena without awaiting discovery request. I don't think this can be accomplished by within 1 day, and a lot of the docs in this matter are not susceptible to production via ftp in load-ready format. But I am confident we can work something out. We can certainly agree to exchange third-party docs with all deliberate haste.
- October 23 is fine for a responsive pleading/MTD; it is of course incumbent on Ds to move for the extension, but please consider that the CFTC does not object.
- We agree to accept email service of documents in this case. (There is of course no need to do this with respect to documents filed on CM/ECF; we are talking presumably about discovery documents and things like that.)

In the meantime, please provide us with a date for take Mr. Kazmi's deposition, as well as 30(b)(6) depositions on TGG US and TGG CAN in advance of the hearing. If Mr. Kazmi plans to testify (i.e., not invoke the Fifth) we can triple-dip. If Mr. Kazmi plans to invoke the Fifth, please advise who will testify on behalf of the corporations. We can probably wait until the end of the week for this. After that I have to send notices.

Thanks,

A

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**From:** Dakota Speas <[dakotaspeas@quinnemanuel.com](mailto:dakotaspeas@quinnemanuel.com)>

**Sent:** Friday, September 15, 2023 12:11 PM

**To:** Burden, Ashley <[ABurden@CFTC.gov](mailto:ABurden@CFTC.gov)>; Paulson, Katherine <[KPaulson@CFTC.gov](mailto:KPaulson@CFTC.gov)>; Streit, Elizabeth M. <[estreit@CFTC.GOV](mailto:estreit@CFTC.GOV)>

**Cc:** Robert Zink <[robertzink@quinnemanuel.com](mailto:robertzink@quinnemanuel.com)>; Michael Shaheen <[michaelshaheen@quinnemanuel.com](mailto:michaelshaheen@quinnemanuel.com)>; Matthew Feibert <[matthewfeibert@quinnemanuel.com](mailto:matthewfeibert@quinnemanuel.com)>; Isabelle Sun <[isabellesun@quinnemanuel.com](mailto:isabellesun@quinnemanuel.com)>

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Thanks Ash. Let's plan to talk on Monday at 2pm ET, if that works for you. To preview my proposals:

- We will issue some basic written discovery requests to your office today. I would like to discuss a reasonable timeline for production in advance of the preliminary injunction hearing. My proposal is that Plaintiff responds and produces responsive documents 1 week from today (on September 22). The requested information should be at your fingertips.

- Can we have a standing agreement that whenever a party receives documents in response to a third-party subpoena, the receiving party will share those documents with all parties within 1 business day? This will avoid the need for successive written requests. I also request that you share all documents Plaintiff has received so far pursuant to subpoenas, without delay.
- We request a 30-day extension to the deadline to file a responsive pleading/Rule 12 motion. This would make the new deadline October 23 (considering the weekend). This is a professional courtesy request, considering we are in the midst of expedited discovery and preparing for the preliminary injunction hearing.
- We are willing to accept email service of filings and other documents in this case, to counsel of record. Email service will be considered the same as personal service for timing purposes. Please confirm Plaintiff agrees.

Thank you for confirming that Mr. Kazmi's deposition is off on Monday. I assumed that was the case, but I wanted to confirm that with you directly. We will confer internally and with our client about a suitable date and get back to you.

If you are unwell today, I hope you feel better soon. And I hope you have a pleasant weekend.

Best,  
Dakota

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**From:** Burden, Ashley <[ABurden@CFTC.gov](mailto:ABurden@CFTC.gov)>  
**Sent:** Friday, September 15, 2023 7:08 AM  
**To:** Dakota Speas <[dakotaspeas@quinnemanuel.com](mailto:dakotaspeas@quinnemanuel.com)>; Paulson, Katherine <[KPaulson@CFTC.gov](mailto:KPaulson@CFTC.gov)>; Streit, Elizabeth M. <[estreit@CFTC.GOV](mailto:estreit@CFTC.GOV)>  
**Cc:** Robert Zink <[robertzink@quinnemanuel.com](mailto:robertzink@quinnemanuel.com)>; Michael Shaheen <[michaelshaheen@quinnemanuel.com](mailto:michaelshaheen@quinnemanuel.com)>; Matthew Feibert <[matthewfeibert@quinnemanuel.com](mailto:matthewfeibert@quinnemanuel.com)>; Isabelle Sun <[isabellesun@quinnemanuel.com](mailto:isabellesun@quinnemanuel.com)>  
**Subject:** RE: [EXTERNAL] CFTC v. Traders Global Group, Inc., et al.

[EXTERNAL EMAIL from [aburden@cftc.gov](mailto:aburden@cftc.gov)]

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I'm indisposed today, but I can talk Monday any time. Or you can email me your proposals or request with respect to the items below.

To the extent I didn't say this before, the deposition of Mr. Kazmi, noticed for Monday, is of course off in consideration of the stipulated extension of the TRO through 10/13. We are still going to need to take Mr. Kazmi's deposition in advance of the hearing, so maybe think about when would be good for your schedules in the interim.

Thanks,

A

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**From:** Dakota Speas <[dakotaspeas@quinnemanuel.com](mailto:dakotaspeas@quinnemanuel.com)>  
**Sent:** Thursday, September 14, 2023 4:14 PM  
**To:** Burden, Ashley <[ABurden@CFTC.gov](mailto:ABurden@CFTC.gov)>; Paulson, Katherine <[KPaulson@CFTC.gov](mailto:KPaulson@CFTC.gov)>; Streit, Elizabeth M. <[estreit@CFTC.GOV](mailto:estreit@CFTC.GOV)>  
**Cc:** Robert Zink <[robertzink@quinnemanuel.com](mailto:robertzink@quinnemanuel.com)>; Michael Shaheen <[michaelshaheen@quinnemanuel.com](mailto:michaelshaheen@quinnemanuel.com)>; Matthew Feibert <[matthewfeibert@quinnemanuel.com](mailto:matthewfeibert@quinnemanuel.com)>; Isabelle Sun <[isabellesun@quinnemanuel.com](mailto:isabellesun@quinnemanuel.com)>  
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Counsel:

Are you free for a call tomorrow to discuss the matter referenced above? Specifically, I would like to discuss:

- Discovery in advance of preliminary injunction hearing
- Deadline to serve responsive pleading/Rule 12 motion

Please let me know a time that works well for you.

Best Regards,  
Dakota

**Dakota Speas**

*Associate*

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